

REMARKS

Claims 48 and 49 are method claims and they have been amended so that they are no longer dependent from apparatus claims. They have been amended by adding the limitations of claim 1 in claim 48, and the limitations of claims 1 and 22 in claim 49. As amended, claims 48 and 49 are now independent claims.

Claims 1-49 and 71-91 were rejected by the Examiner under 35 USC §102(b) as being anticipated by Williams (ref. E in IDS). Of these claims as amended herein, claims 1, 36, 48 and 49 are independent with all other claims dependent from either claim 1 or claim 36. Initially, claims 1 and 36 will be discussed with respect to the cited reference. Since both of claims 48 and 49 induce the limitations of claim, the discussion that follows with respect to claim 1 is equally applicable to each of claims 48 and 49.

Claim 1 calls for, in part:

"A magnetic levitation (maglev) stage..., comprising:

...

first and second side magnet arrays **arranged on respective opposite first and second sides of the platen;**

a support frame **at least partially surrounding the platen** on the first and second sides and the bottom surface;

a plurality of motor coils arranged on the support frame so as to be in **operable communication with** the set of magnet arrays and **the first and second side magnet arrays;** and

wherein the set of magnet arrays and first and second side magnet arrays and the plurality of motor coils are **operable to magnetically levitate the platen within the support frame** and move the platen in up to six degrees of freedom (DOF)." (emphasis added)

and

Claim 36 calls for, in part:

“A method of moving a workpiece supported by a platen, comprising:

arranging a plurality of magnet arrays **on one or more of the platen surfaces** so that the magnet arrays are **arranged symmetrically about the center of gravity of the platen;**

providing motor coils on a support frame that partially surrounds the platen; and

operatively coupling the motor coils one to each magnet array so that one or more forces may be applied to the platen along one or more axes passing through a center of gravity of the platen to move the platen in up to six degrees of freedom.” (emphasis added)

A careful reading of the Williams Ref. reveals that the stage disclosed therein has a number of significant differences from the Applicant’s invention as claimed in independent claims 1 and 36.

A close inspection of Williams Ref., including Figures 1-4 therein—and specifically Figures 2 and 3—clearly reveals that **there are no** “first and second side magnet arrays arranged on opposite first and second sides of the platen” as called for in claim 1, or . Rather, the platen in Williams Ref. only includes **actuators and magnets** arranged on the **platen’s bottom surface**, as shown in Figures 2 and 3 and as described in the first paragraph of Williams Ref. on page 2.

Further, the support frame in Williams Ref. does not **“at least partially [surround] the platen** on the first and second sides and the bottom surface” as called for in Applicant’s claim 1, or “[provide] motor coils on **a support frame that partially surrounds the platen”** as called for in Applicant’s claim 36. Rather, the support frame of Williams Ref. **is entirely underneath the platen**, as illustrated in

the cited reference's Figure 1.

Nor does Williams Ref. disclose "a plurality of motor coils arranged on the support frame so as to be in **operable communication with the set of magnet arrays and the first and second magnet arrays,**" as called for in Applicant's claim 1. In point of fact, this arrangement and mode of operability is ***impossible*** with the stage disclosed in Williams Ref., since **the support frame disclosed in Williams Ref. does not surround a portion of the sides of the platen, and since the platen of Williams Ref. has no magnets arranged on any of its sides.** Consequently, the arrangement and mode of operation of the stage of Williams Ref. is ***entirely different*** from that as claimed by the Applicant.

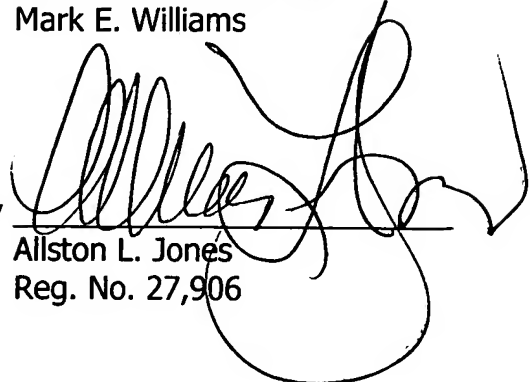
Finally, the stage of Williams Ref. cannot operate to "magnetically levitate the platen ***within the support frame***" as required in Applicant's claim 1 because the support frame in Williams ***has no sides*** that would allow the platen to ever be ***within*** the support frame. In Williams Ref., the platen is levitated entirely ***above*** the support frame, as opposed to being levitated ***within*** the support frame as required by Applicant's invention as claimed. Again, the modes of levitation as disclosed in Williams Ref. and as claimed herein by the Applicant are ***entirely different*** modes of levitation.

In view of the above showing, the rejection of independent claims 1, 36, 48 and 49 and dependent claims 2-35, 37-47 and 71-91 under 35 U.S.C. 102(b) based on Williams Ref. is respectfully traversed. Any ***one*** of the numerous significant differences described above between Williams Ref. and Applicant's invention as claimed precludes a rejection under 35 U.S.C. § 102(b). The fact there are ***numerous*** significant differences makes it clear that Applicant's invention as presently claimed is clearly distinguishable from the disclosure in Williams Ref. Applicant therefore respectfully requests withdrawal of the rejection and allowance of all of the rejected claims.

Favorable action is respectfully requested.

Respectfully submitted,
Mark E. Williams

by


Allston L. Jones
Reg. No. 27,906

Peters, Verny, Jones & Biksa, LLP
385 Sherman Ave., Suite 6
Palo Alto, CA 94306
Voice: 650/324-1677 (Mail Box #4)
FAX: 650/324-1678
e-mail: alj888@aol.com
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